TO THE HONORABLE JUDGES OF SAID COUPT.

The Petition of Susie E. Hanes and Maurice Hanes, the Complainants in the above-entitled cause, respectfully shows; -

1. That the Pill of Complaint and the answers of the Guardian ad Litem for the infant defendants have been filed and the cause is now ready to be referred to one of the standing Examiners of this Court to take testimony to support the Pill.

To the end, therefore,

That your Honorable Court will pass an order in the premises referring the papers to one of the Standing Examiners to take testimony to support the bill.

And as in duty bound, etc.,

Solicitor for Complainants.

Ordered, this 6th day of August, A.D. 1923, by the Circuit court for Frederick County, sitting as a Court of Equity, and by the authority thereof, upon the aforegoing Petiti on, that the papers and proceedings in this cause be, and they are, hereby referred to any one of the Standing Examiners of this Court with authority to take testimony in support of the bill, after which the papers and proceedings will be returned to this Court.

(Filed August 6, 1923)

Glenn H. Worthington.

TESTIMONY.

11

11

Susie E. Hanes, Maurice Hanes,

Vs.

Maudie V. Sullivan, James F. Sullivan, Paul M. Sullivan and Ella M. Sullivan. No. 10, 789 Equity.

In the Circuit Court for

Frederick County, Sitting as

a Court of Equity.

In pursuance of an Order of Court, passed August 6th, 1923, and notice given me by the Solicitor for the Plaintiff, I, Harry C. Hull, one of the Standing Examiners of your Honorable Court, duly commissioned, qualified and sworn, did, on the Lighth day of August, A.D. 1923, at my Law Office in the City of Frederick, and the State of Maryland, at the Hour of 10 c'clock A.M. proceed to take the following depositions of the witnessesin said cause then and there produced before me.

Present; S.P. Bowers,

Solicitor for Plaintiff.

Susie E. Hanes, Complainant.

Witnesses;

Maurice Hanes, and Ernest W. Purch.

SUSIE E. HANES, a witness of lawful age, produced on the part of the complainants, being first duly sworn, testified as follows;-

My name is Susie E. Hanes; I reside in Washington County, Md., my husband's name is Maurice Hanes. Whe have a family of seven children of our own. My father Thomas F. Sullivan died in the early part of Eune of this year and my mother, Ella May Sullivan died July 28, 1923. I am the only adult child living, but I have several brothers and sisters who died sometime ago but they have left no issue or children and were not married. I have the following infant brothers and sisters;

- (a) Maudie Virginia Sullivan.born Nov. 2.1909.
- (b) James Franklin Sullivan, born April 28, 1912.
- (c) Paul Albert Sullivan, born Nov. 28, 1914.
- (d) Ella May Sullivan, born July 14, 1920.

Sometime after the death of my father and when my mother was mentally deficient I took these four infant children to our home in Washington Co. and cared for them